

KENNEDY P. RICHARDSON, Cal. Bar No. 62516
DAVID M. ROSENBERG-WOHL, Cal. Bar. No. 132924
MARION'S INN LLP
1611 Telegraph Avenue, Suite 707
Oakland, California 94612-2145
Telephone: (510) 451-6770
Facsimile: (510) 451-1711
Email: kpr@marionsinn.com
drw@marionsinn.com

Attorneys for Defendant
THE PERMANENTE MEDICAL GROUP, INC.,
erroneously named as
KAISER FOUNDATION HEALTH PLAN, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LUCY JOSON

Plaintiff,

vs.

KAISER FOUNDATION HEALTH PLAN, INC.;
and Does 1 through 50, inclusive;

Defendants.

Case No. CV11-1018 JW

STIPULATION RE AMENDING COMPLAINT
TO PROPERLY NAME DEFENDANT AND
TO EXTEND TIME FOR RESPONSE [AND
ORDER] **AS MODIFIED BY COURT**

STIPULATION

The above-named parties, by and through their respective, undersigned counsel, hereby agree to the following:

1. Kaiser Foundation Health Plan, Inc., has been erroneously named as a defendant. The Permanente Medical Group, Inc., and not Kaiser Foundation Health Plan, Inc., was the plaintiff's employer at the times alleged in the original complaint.
2. Plaintiff will file and serve an amended complaint naming The Permanente Medical Group, Inc., instead of Kaiser Foundation Health Plan, Inc. The Permanente Medical Group, Inc. ("TPMG") may be served through its attorneys, Marion's Inn LLP.
3. TPMG will have sixty (60) days to answer or otherwise respond to the amended

complaint, commencing from the date of service of the amended complaint upon TPMG.

4. Any dates under local or federal rules that are keyed to the filing or service of the original complaint are voided and, instead, shall be calendared on the basis of the dates of filing or service of the amended complaint.
5. The substitution of the named defendant in this lawsuit will have no effect upon any applicable statute of limitations. Upon the filing and service of an amended complaint naming TPMG, plaintiff will be deemed to have filed and served its original complaint naming TPMG, not Kaiser Foundation Health Plan, Inc.

Dated: May 19, 2011

MARION'S INN LLP

David M.
Rosenberg-Wohl

By

David M. Rosenberg-Wohl
Attorneys for Defendant
Kaiser Foundation Health Plan, Inc.

Digitally signed by David M. Rosenberg-Wohl
DN: cn=David M. Rosenberg-Wohl, o=Marion's
Inn LLP, ou, email=dmg@marionsinn.com, c=US
Date: 2011.05.19 14:51:51 -0700

Dated: May 19, 2011

ADVOCACY CENTER FOR EMPLOYMENT LAW

By /s/

Steven P. Cohn
Attorneys for Plaintiff Lucy Joson

ORDER

So ordered. **On or before May 27, 2011, plaintiff shall file the amended complaint as a separate docket entry.**

DATED: May 20, 2011

Hon. James Ware

